

One of Szepanski's primary aims was to allow a document to be *visually* checked to identify alterations. He notes:

"An optimally protected document should meet several fundamental requirements. Firstly, erasures, corrections, or imitations of the document as a whole should be as hard to carry out as possible. *Secondly, any manipulations should be easy to detect by simple visual inspection.*"

(Col. 1, page 101.)

The protective line pattern taught by Szepanski meets this aim. The steganographic technique taught by Komatsu does not. If Komatsu's teachings were employed in Szepanski, manipulations would *not* be easy to detect by simple visual inspection.

Since adoption of Komatsu's technique would frustrate Szepanski's stated objective, applicant respectfully submits that an artisan would have been led *away*, not towards, the combination as proposed in the Action.

Favorable reconsideration and passage to allowance are solicited.

Date: August 29, 2001



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PATENT TRADEMARK OFFICE

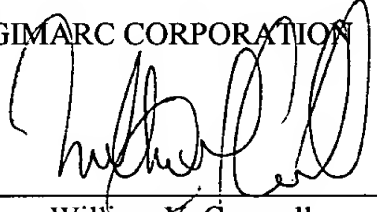
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Respectfully submitted,

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